REMARKS

Claims 1, 3-8, and 10-15 are pending in the present application. Claims 2 and 9 are cancelled, and claims 7 and 14 are amended. Reconsideration of the claims is respectfully requested.

I.   Interview Summary

An interview with the examiner was held on September 27, 2005 between the examiner and the undersigned agent to discuss the anticipation rejection. No agreement was reached.

II.   35 U.S.C. § 112, Second Paragraph; Claims 7 and 14

The examiner rejects claims 7 and 14 under 35 U.S.C. § 112, second paragraph, as indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. Specifically, the examiner rejects claims 7 and 14 because the claims contain the trademark/trade name Windows NT and UNIX. Claims 7 and 14 have been amended accordingly. Therefore, claims 7 and 14 should be in allowable form.

III.   35 U.S.C. § 102, Anticipation; Claims 1, 3-8, and 10-15

The examiner rejects claims 1, 3-8, and 10-15 under 35 U.S.C. § 102(a) as anticipated by *Massarani*, Content-Indexing Search System and Method Providing Search Results Consistent with Content Filtering and Blocking Policies Implemented in a Blocking Engine, U.S. Patent No. 6,336,117 (January 1, 2002) (hereinafter "*Massarani*"). This rejection is respectfully traversed.

The examiner states that:

> Regarding claims 1, 8, and 15, Massarani teaches a method/system/computer program product in a computer readable medium for use in a data processing system for filtering incoming data from an external computer network, the method/system/computer program product comprising:
> • A firewall that is coupled to said external computer network (fig. 1, ref. num 126/127/135/136);
> • A server computer system coupled to an internal computer network (fig. 1, ref. num 124);
> • A plurality of clients that are coupled to said server computer system, said plurality of clients being unable to access said external computer network directly (fig. 1, ref. num 102/104);

- Receiving, at said firewall, a document from said external computer network (fig. 3, ref. num 308 and col. 6, lines 14-16);
- Determining, by said firewall, whether said document is from a known blocked site (fig. 3, ref. num 312 and col. 6, lines 20-22);
- In response to determining that said document is from a known blocked site, blocking, by said firewall, said document without scanning said document (fig. 3, ref. num 312 and col. 6, lines 20-22);
- Determining, by said firewall, whether said document is from a know safe site (fig. 3, ref. num 310 and col. 6, lines 17-19);
- In response to determining that said document is from a known safe site, forwarding, by said firewall, said document without scanning said document, all of said plurality of clients being permitted to access said forwarded document (fig. 3, ref. num 312 and col. 6, lines 20-22);
- In response to determining that said document is not from a known blocked site or a know safe site, scanning, by said firewall, text fields included in said document for pre-selected keywords (fig. 3, ref. num 316 and col. 6, lines 27-29);
- Blocking, by said firewall, the document if any of said text fields include content that contains pre-selected keywords (fig. 3, ref. num 316 and col. 6, lines 27-29);
- Said server computer system being prohibited from receiving said document in response to said document being blocked (fig. 3, ref. num 316 and col. 6, lines 27-29); and
- Indicating that a site that sent said document is a known blocked site by adding, by said firewall, the address of said site to a filtering table (col. 6, lines 27-29 and col. 7, lines 25-30).

Office Action dated June 28, 2005, pages 4-5.

Regarding claim 1, *Massarani* does not anticipate claim 1 because *Massarani* fails to show all the limitations of claim 1. A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994).

Claim 1 provides as follows (emphasis added):

1.   A method for filtering incoming data from an external computer network, comprising:
  a firewall that is coupled to said external computer network;
  a server computer system coupled to an internal computer network;
  a plurality of clients that are coupled to said server computer system, said plurality of clients being unable to access said external computer network directly;

receiving, at said firewall, a document from said external computer network;

determining, by said firewall, whether said document is from a known blocked site;

in response to determining that said document is from a known blocked site, blocking, by said firewall, said document without scanning said document;

determining, by said firewall, whether said document is from a known safe site;

in response to determining that said document is from a known safe site, forwarding, by said firewall, said document to said server without scanning said document, all of said plurality of clients being permitted to access said forwarded document;

in response to determining that said document is not from a known blocked site or a known safe site, scanning, by said firewall, text fields included in said document for pre-selected keyword(s);

blocking, by said firewall, the document if any of said text fields include content that contains pre-selected keywords;

said server computer system being prohibited from receiving said document in response to said document being blocked; and

indicating that a site that sent said document is a known blocked site by *adding, by said firewall*, the address of said site to a filtering table.

Massarani does not show the claimed feature of adding, by said firewall, the address of said site to a filtering table, as emphasized in claim 1 above. Thus, *Massarani* does not anticipate claim 1.

The examiner asserts that *Massarani* does show the claimed feature by referring to figure 1, reference numerals 126, 127, 135, and 136, and the cited portions of the text of *Massarani*.

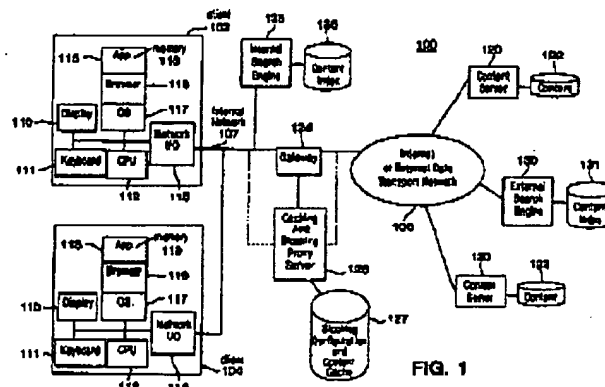Figure 1 of *Massarani* is as follows:

FIG. 1

Figure 1 depicts an information retrieval system that provides search results based on filtering and blocking policies. The information retrieval system includes a gateway (no. 124), a proxy server that includes a cache and content filtering engine (no. 126), a database that stores the cache and filtering engine (no. 127), an internal search engine (no. 135), and a database of keyword searches (no. 136). The proxy server (126) controls the actual content blocking policy and provides the means to filter undesirable URL's and documents. The filtering or blocking configurations are generated by the client and installed at the proxy server (126)

Massarani does not actually describe a firewall anywhere in the text of the reference and does not label anything in figure 1 as a firewall. Assuming, arguendo, that *Massarani* does show a firewall, then only the gateway (124) could be construed to be a firewall. However, the gateway (124) itself does not add the address of new undesirable sites to a filtering table in the manner claimed. Assuming, arguendo, that *Massarani* does show adding an address to a filtering table, then the only place where *Massarani* performs this action is in the proxy server (126) and not in the gateway (124). The proxy server (126) is not a firewall as shown and described in *Massarani*. Thus, *Massarani* does not anticipate claim 1.

On the other hand, the claimed invention uses a firewall to control, block, scan, and add addresses to the filtering table. The firewall in the claimed invention controls the flow of information between the external and internal computer networks. *See also* Specification, lines 7-10 on page 6. The claimed invention does not use a separate proxy server, but rather allows for the filtering of incoming data from an external computer network using a firewall. *Massarani* does not show this claimed feature and therefore does not show all the features of the present invention. Therefore, *Massarani* does not anticipate claim 1.

Additionally, the examiner asserts that *Massarani* does show the claimed feature of adding, by said firewall, the address of said site to a filtering table by referring to column 6, lines 27-29 and column 7, lines 25-30 of *Massarani*. During the examiner interview, the examiner additionally referred to column 7, lines 21-24. The cited text is as follows:

> [Column 6, lines 27-29] In step 316, if an exclusionary keyword list is specified, the document text is scanned and the document is excluded if it contains one or more keywords in the list.

> [Column 7, lines 21-24] In step 507, any document found in the cache is added to the indexing database as complying with the blocking filtering policy to one or more user groups in local installation.

[Column 7, lines 25-30] The primary advantage of the process of FIG. 5 is the application of the filtering and blocking rules is done only once by the engine designed to do so, i.e., the caching and blocking engine. The scanning and indexing operation is performed on a local (high performance) copy of the target content, rather than the more variable Internet content sites.

Massarani, column 6, lines 27-29 and column 7, lines 21-30.

The cited text describes the process of blocking a document requested by the user in an internet search request if the document contains certain keywords. The cited text also details the process of searching and filtering internal source sites, i.e. an intranet, rather than external websites. The internal search process includes adding any document within the repository of internal source sites into an indexing database, which is a database tree defined by a certain user group with specific content filtering rules. The last section of the cited text describes the asserted primary advantage of the *Massarani* process, that filtering and blocking rules are done only once rather than multiple times. However, none of the cited text describes adding the address, by a firewall, of a site to a filtering table that sent a document from a known blocked site. On the other hand, the claimed invention does add, by a firewall, an internet address to the filtering table if a document is sent from a site not currently listed in the known blocked site list.

Additionally, *Massarani* only adds allowed documents to the indexing database, not blocked addresses that sent rejected documents. *Massarani* only adds documents to the indexing database from an internal source site and not an external source site, as in the present invention. Also, as shown above, *Massarani* does not add the address to a filtering table using a firewall, as claimed. As indicated above, *Massarani* controls all the blocking and filtering procedures through the proxy server and not through any component that could be construed to be a firewall, such as possibly gateway (124).

Furthermore, the fact that the filtering and blocking rules are only done once does not automatically lead to the conclusion that the reason that the process is only done once is because the internet address is added to the filtering table. *Massarani* expressly states that the filtering and blocking rules are only done once in an internal search because the content of the internal source sites do not change. The content of an external site changes, and therefore *Massarani* indicates external sites must be examined more than once since content on the site that was once safe may have changed to undesirable content. Therefore, *Massarani* does not show the feature

of indicating that a site that sent said document is a known blocked site by adding, by said firewall, the address of said site to a filtering table. Accordingly, *Massarani* does not anticipate claim 1.

Because claims 8 and 15 cover the same subject matter as claim 1, the same distinctions between claim 1 and *Massarani* apply to claims 8 and 15. Because claims 3-7 and 10-14 depend from claims 1 and 8, the same distinctions between *Massarani* and the claimed invention in claims 1 and 8 also apply for these claims. Additionally, *Massarani* does not show other features of the dependent claims. For example, *Massarani* does not show the claimed feature of periodically refreshing the filter to enact the updated filtering table, as claimed in claim 7. Therefore, the rejection of claims 1, 3-8, and 10-15 under 35 U.S.C. § 102(a) has been overcome.

IV.   Conclusion

It is respectfully urged that the subject application is patentable over the cited reference and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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